

IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

**SARAH UPDIKE, et al.** : Case No. 1:22-cv-00374  
Plaintiffs, :  
: Judge Michael R. Barrett  
v. :  
**SARA JONAS, et al.** : **STIPULATION OF THE PARTIES**  
Defendants. :  
:

Plaintiffs, Sarah and James Updike, individually and as parents and next friends for their three minor children I.U., A.U. and K.U., Jennifer and Antonio Ciolino, individually and as parents and next friends for their minor child R.C., Natalie and Jeffrey Hastings, individually and as parents and next friends for their minor child C.J., and Janielle Davis, individually and as parent and next friend of her minor child J.D. (collectively "Plaintiffs"), and Defendants, Sara Jonas, Linda Hausfeld, Bob Bibb, Katie Stewart, Leslie Rasmussen, and Larry Hook, all in their official capacities, and the Board of Education of the Forest Hills School District, and the Forest Hills School District (collectively "Defendants"), hereby stipulate and agree as follows:

Defendants will not take any action to enforce, implement or attempt to enforce or implement the Forest Hills Local School District Board of Education (Board) "Resolution to Create a Culture of Kindness and Equal Opportunity for All Students and Staff" (Resolution) which was passed by the Board on June 22, 2022, nor will the Defendants create or commence the process to create any Policy of the Board which is intended to enforce or implement such Resolution during the pendency of this case in this Court.

Upon the execution and filing of this Stipulation by the Parties and approval of the Court, the briefing schedule for Plaintiffs Motion for Temporary Restraining Order and Preliminary Injunctive Relief will be stayed.

The parties further agree that this Stipulation is not a waiver or limitation of any claim or defense of any party, and that all such claims and defenses are preserved.

The parties further agree that the undersigned counsel for the parties have been given full power and authority to enter into this Stipulation and that it will have binding effect upon the parties.

**Stipulated and Agreed:**

On Behalf of the Plaintiffs:

s/W. Kelly Lundrigan  
s/ Nicole M. Lundrigan  
W. Kelly Lundrigan (0059211)  
Nicole M. Lundrigan (0075146)  
LUNDRIGAN LAW GROUP CO, LPA  
1080 Nimitzview Drive, Suite 402  
Cincinnati, Ohio 45230  
Phone (513) 813-7610  
[klundrigan@lundrigan-law.com](mailto:klundrigan@lundrigan-law.com)  
[nlundrigan@lundrigan-law.com](mailto:nlundrigan@lundrigan-law.com)  
*Attorneys for Plaintiffs*

On Behalf of the Defendants:

s/R. Gary Winters  
R. Gary Winters (0018680)  
Bernard Wharton (0063487)  
McCaslin, Imbus & McCaslin, LPA  
600 Vine St, Ste. 800  
Cincinnati, Ohio 45202  
Phone: 513-421-4646  
Fax: 513-421-7929  
Email: [rgwinters@mimlaw.com](mailto:rgwinters@mimlaw.com)  
[bwwharton@mimlaw.com](mailto:bwwharton@mimlaw.com)  
*Attorneys for Defendants*

**Approved:**

/s Michael R. Barrett  
Michael R. Barrett, Judge  
United States District Court